

**EXHIBIT B****Plaintiff's Proposed Constructions and Citations to Evidence for Claim Terms in  
U.S. Patent No. 6,724,435 (the "435 Patent")**

No.	Claim Terms	Plaintiff's Proposed Construction	Plaintiff's Intrinsic and Extrinsic Evidence <sup>1</sup>
1.	"individual color"	A linear combination of colors or color components, such as red, green, blue, yellow, cyan, and magenta.	<b><u>Intrinsic Evidence:</u></b> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• '012 Patent, Abstract</li> <li>• '012 Patent, Fig. 1</li> <li>• '012 Patent, 1:12-52; 2:42-64; 4:18-38; 4:45-51; 4: 60-63; 4:64-5:49; 5:23-39; 5:40-49; 6:27-55; 7:1-8:13; 8:36-39; 8:55-67; 9:32-50; 10:4-24; 10:25-11:30; 11:36-37; 12:30-51; 12:52-13:37; 15:21-26; 15:31-37; 15:51-16:32; 17:8-20</li> <li>• '435 Patent, Abstract</li> <li>• '435 Patent, 1:8-2:7; 2:33-37; 2:61-67; 4:41-47; 4:55-5:12; 6:2-26; 6:40-7:14; 8:39-52; 9:15-33; 10:25-43; 10:53-60; 14:30-45; 20:39-42; 21:19-34; 25:66-26:10</li> </ul>
2.	"without affecting the hue or the saturation of any other individual color"	<i>See</i> "individual color," "hue" and "saturation."  without affecting the hue or the saturation of any other	<b><u>Intrinsic Evidence:</u></b> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> </ul>

<sup>1</sup> The citations to intrinsic evidence herein are exemplary, and Plaintiff intends to rely on all related citations that are substantially similar to the excerpts identified in this chart. Additionally, Plaintiff Lone Star reserves the right to reply upon any or all references cited by Defendants.

		individual color, that was not selected to be changed	<ul style="list-style-type: none"> <li>• ‘435 Patent, Abstract</li> <li>• ‘435 Patent, 1:57-2:7; 2:8-30; 2:52-67; 3:1-7; 3:41-51; 4:24-32; 4:55-5:12; 5:38-42; 5:43-65; 8:25-62; 12:9-15; 25:66-26:10</li> </ul>
3.	“arbitrary interval of integers”	A range between two whole numbers.	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• ‘435 Patent, claim 7</li> <li>• ‘435 Patent, Abstract</li> <li>• ‘435 Patent, 7:45-55; 8:4-14</li> </ul>
4.	“characterizing”	<p>Not indefinite.</p> <p>Plain and ordinary meaning</p> <p>Or, in the alternative:</p> <p>specifying</p>	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• ‘012 Patent, Abstract</li> <li>• ‘012 Patent, Fig. 1</li> <li>• ‘012 Patent, 2:25-41; 4:17-63; 8:15-16; 12:25-29</li> <li>• ‘435 Patent, Abstract</li> <li>• ‘435 Patent, Fig. 1</li> <li>• ‘435 Patent, 1:28-57; 2:43-51; 2:61-67; 3:8-21; 4:34-40; 6:2-26; 6:40-7:17; 9:1-5; 9:51-57; 12:41-49; 12:58-13:5; 13:32-39; 16:17-26; 16:52-17:4; 20:57-60; 23:10-26; 23:60-64</li> </ul> <p><b><u>Extrinsic Evidence:</u></b></p> <p>THE SCIENCE OF COLOR (Steven Shevell ed., Elsevier 2d ed. 2003)</p> <p>Adobe Sys. Inc., <i>Matching RGB Color from Monitor to Printer</i>,</p>

			Technical Note #5122, Feb. 14, 1992.
5.	“Input image pixel”	Plain and ordinary meaning.	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• ‘012 Patent, Abstract</li> <li>• ‘012 Patent, Fig. 1</li> <li>• ‘012 Patent, 1:59-3:27; 4:11-17:44</li> <li>• ‘435 Patent, Abstract</li> <li>• ‘435 Patent, 3:8-4:54; 6:40-8:3, 8:53-26:65</li> </ul>
6.	“Forming a corresponding plurality of output image pixels having said selected individual color”	No construction necessary.	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• ‘012 Patent, Abstract</li> <li>• ‘012 Patent, Fig. 1</li> <li>• ‘012 Patent, 1:59-3:27; 4:11-17:44</li> <li>• ‘435 Patent, Abstract</li> <li>• ‘435 Patent, 3:8-4:54; 6:40-8:3, 8:53-26:65</li> </ul>
7.	“By performing arithmetic and logical operations”	Not indefinite. Plain and ordinary meaning.	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• ‘435 Patent, Abstract</li> </ul>

			<ul style="list-style-type: none"> <li>• ‘435 Patent, 3:8-4:32; 9:34-61; 10:25-11:30.</li> </ul>
8.	“Evaluating” and “Evaluated”	Not indefinite. Plain and ordinary meaning.	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• ‘012 Patent, Abstract</li> <li>• ‘012 Patent, Fig. 1</li> <li>• ‘012 Patent, 1:59-3:27; 4:11-17:44</li> <li>• ‘435 Patent, Abstract</li> <li>• ‘435 Patent, 1:19-29; 3:8-4:33; 4:41-54; 5:67-6:26; 11:41-12:9; 12:58-13:5; 13:40-58; 14:30-48; 15:20-39; 16:11-17:3; 17:5-25; 18:1-19:16; 20:5-19; 21:20-22:13; 22:36-54; 23:11-24:16 ; 24:41-60; 25:16-35.</li> </ul>
9.	“viewer”	Graphic user interface (GUI) menu display, configured on a man-machine interaction (MMI) mechanism.	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• ‘435 Patent, Abstract</li> <li>• ‘435 Patent, 3:55-65; 4:55-65; 11:46-64; 26:21-37, 48-55</li> </ul>
10.	As applied to Claim 17: The combination of method steps and system elements in a single system claim: <i>operating</i> said master control device . . . ; <i>selecting</i> an independent color hue control delta value or an independent color	Not indefinite. Claim 17 contains permissible functional limitations that describe the system by reciting its capabilities. <i>MasterMine Software, Inc. v. Microsoft Corp.</i> , 874 F.3d 1307, 1313 (Fed. Cir. 2017).	<p><b><u>Intrinsic Evidence:</u></b></p> <ul style="list-style-type: none"> <li>• All claims in which this term appears</li> <li>• ‘435 Patent, Abstract</li> <li>• ‘435 Patent, 3:55-65; 4:55-65; 11:46-64; 26:21-37, 48-55</li> </ul>

	saturation control delta value . . . ; <i>identifying</i> a plurality of said input image pixels . . . ; <i>determining</i> corresponding output image pixel values . . . ; <i>displaying</i> a real time digital video output image . . .		
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